

UNITED STATES DISTRICT COURT  
For the  
Western District of Wisconsin

DOC NO  
REC'D/FILED  
2009 DEC 11 AM 9:16  
PETER OPPENEER  
CLERK US DIST COURT  
WD OF WI

CHAI CHANG  
Plaintiff

V.

PN CREDIT SERVICES, INC.  
Defendant

Civil Action No.:  
09-cv-557

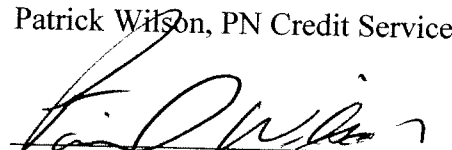
**DEFENDANT'S AFFIDAVIT IN SUPPORT OF  
OPPOSITION TO PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT**

Now comes the Defendant in the above-captioned matter and provides his  
Affidavit under the pains and penalties of perjury.

- 1) Defendant is a Massachusetts Corporation and does not have any locations in Wisconsin.
- 2) Defendant has local counsel in Massachusetts; said counsel has attempted to resolve this matter out of court and answer was not filed pending settlement discussions.
- 3) As the parties are unable to finalize settlement at this time, Defendant has provided his Answer attached hereto.
- 4) Defendant will obtain local counsel to defend this lawsuit.
- 5) The Defendant will be unduly harmed by the entry of default whereas the Plaintiff will still have its day in court should the matter continue.

**WHEREFORE**, the Defendant in the above-captioned matter respectfully requests this Honorable Court to deny Plaintiff's Motion for Entry of Default and permit this matter to continue.

Patrick Wilson, PN Credit Services Inc, Pro Se:



Patrick Wilson, Compliance Dept  
PN Credit Services, Inc.